## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

LI WANG,

Plaintiff,

-against-

Civil Action No. 1:24-cv-07781

HAITOU GLOBAL (CAYMAN) INC., HI2 GP LLC, HI2 INVESTMENT MANAGEMENT, LLC, JINLONG (JERRY) WANG, CARLOHA INC., AND LIANG LONG,

Defendants.

## STIPULATION TO ARBITRATE CROSSCLAIMS BY CARLOHA INC. AND TO STAY CROSSCLAIMS BY LIANG LONG PENDING ARBITRATION

Defendants Haitou Global (Cayman) Inc., Hi2 GP LLC, Hi2 Investment Management, LLC, Jinlong (Jerry) Wang (collectively, "Haitou Defendants"), Carloha Inc., and Liang Long (collectively with Haitou Defendants, the "Parties"), by and through their respective counsel of record, hereby stipulate as follows:

- 1. Haitou Defendants and Carloha Inc. agree to arbitrate Carloha Inc.'s crossclaims against Haitou Defendants before the American Arbitration Association (AAA). Accordingly, Carloha Inc.'s crossclaims against Haitou Defendants shall be stayed pending arbitration.
- 2. Haitou Defendants and Carloha Inc. agree to arbitrate any claims related to or arising out of the promissory notes pertaining to Plaintiff's investments alleged in this action, to the fullest extent permitted by the arbitration clause in the promissory notes, before the AAA, notwithstanding that the arbitration clause under the promissory notes designates a different forum.

## -[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED that,

- 1. Defendant Carloha Inc.'s crossclaims against Haitou Global (Cayman) Inc., Hi2 GP LLC, Hi2 Investment Management, LLC, Jinlong (Jerry) Wang shall be arbitrated before the AAA and are stayed.
- 2. Defendant Liang Long's crossclaims against Haitou Global (Cayman) Inc., Hi2 GP LLC, Hi2 Investment Management, LLC, Jinlong (Jerry) Wang are stayed pending the outcome of the aforementioned arbitration.

Dated: Meter (19, 2024

HON. DENISE L. COTE

UNITED STATES DISTRICT JUDGE